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Counsel for Defendant JOSE VLADAMIR ORTIZ

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE VLADAMIR ORTIZ,

Defendant.

No. CR 15-00212 JST

STIPULATION AND [PROPOSED]
ORDER CONTINUING DATE FOR
CHANGE OF PLEA; EXCLUSION OF
TIME

STIPULATION

IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of plea date for Jose Vladamir Ortiz, currently scheduled for June 5, 2015, at 9:30 a.m., may be continued one week to June 12, 2015, at 9:30 a.m. for change of plea. The reason for the request is that defense counsel is unavailable after 10:30 a.m. Continuing the matter for one week will ensure that counsel can be present with Mr. Ortiz during the change of plea.

IT IS FURTHER STIPULATED THAT the time from June 5, 2015, to June 12, 2015, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and (h)(7)(B)(iv) for continuity of counsel and effective preparation so that defense counsel can be

1 present during the change of plea and answer his questions during the proceedings.

2 DATED: 5/28/15

/s/
JOYCE LEAVITT
Assistant Federal Public Defender

4 DATED: 5/28/15

/s/
KATIE BURROUGHS MEDEARIS
Assistant United States Attorney

7 I hereby attest that I have permission of the parties to enter a conformed signature (/s/) for all
8 signatures within this e-filed document.

9
10 **ORDER**

11 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the court date for Jose Ortiz,
12 currently scheduled for June 5, 2015, is continued to June 12, 2015, at 9:30 a.m. for change of plea.

13 IT IS FURTHER ORDERED THAT the time from June 5, 2015, to June 12, 2015, be excluded
14 in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(1)(A) and
15 (h)(7)(B)(iv) for continuity of counsel and effective preparation of counsel taking into consideration
16 due diligence so that defense counsel can be present during the change of plea and answer questions,
17 as well as advise Mr. Ortiz during the proceedings. The Court finds there is good cause and the ends
18 of justice served by the granting of the continuance outweigh the interests of the public and
19 defendant. Failure to grant the requested continuance would unreasonably deny counsel reasonable
20 time necessary for effective preparation, taking into account due diligence.

22 SO ORDERED.

23 DATED: May 28, 2015

24
25 HON. JUDGE
United States

